

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DEARREA KING,	:	
	:	
Plaintiff,	:	Case No. 2:18-CV-1060
	:	
v.	:	
	:	Chief Judge Edmund A. Sargus
CITY OF COLUMBUS, OHIO, et al.,	:	
	:	Magistrate Judge Elizabeth P. Deavers
Defendants.	:	
	:	
v.	:	
	:	
P.R., <i>et al.</i> ,	:	
	:	
Third-Party Defendants.	:	

**UNOPPOSED MOTION TO SET BRIEFING SCHEDULE FOR THIRD-PARTY
DEFENDANTS TO FILE SUPPLEMENTAL BRIEFING IN OPPOSITION TO
DEFENDANTS' MOTION FOR PROTECTIVE ORDER**

Third-Party Defendant P.R.¹ respectfully requests that the Court set a briefing schedule to provide her with the opportunity to respond to the Motion for Protective Order (ECF No. 40) (the “Motion”) filed by Defendants, the City of Columbus and Bryan Mason (collectively “Defendants”). Third-Party Defendants A.B. and Jaronn Collins join P.R. in this motion (collectively “Third-Party Defendants”).

Although discovery between Plaintiff Dearrea King and Defendants has been ongoing for a number of months, counsel for the Third-Party Defendants were just appointed on May 12, 2019, roughly three-weeks ago, *after* Defendants’ Motion was filed. (ECF No. 42.) The Motion

¹ Third-Party Defendants P.R. and A.B. are minors and thus must be identified by initial only pursuant to Fed. R. Civ. P. 5.2.

generally seeks to protect Officer Bryan Mason's information and documentation regarding substance use, behavior, mental health, and physical health, among other things. (*See generally* ECF No. 40.) Such discovery may be relevant to the Third-Party Defendants' anticipated discovery requests and ultimate defenses in this case. Thus, the Third-Party Defendants may be prejudiced if they are not provided an opportunity to be heard on this issue.

On May 22, 2019, the Court held a status conference, at which time it granted the Third-Party Defendants' counsel time to become acquainted with the case and set a follow-up status conference for June 20, 2019. (ECF No. 44.)

The Third Party Defendants therefore respectfully request that the Court set a briefing schedule so that they may have an opportunity to file an opposition to Defendants' Motion. Defendants' counsel has been contacted and does not oppose this Motion.

Respectfully submitted,

/s/ Alycia N. Broz

Alycia N. Broz (0070205), *Trial Attorney*

Angelyne E. Lisinski (0089699)

Sarah Spector Boudouris (0095545)

P. Wilson Reiser (0097725)

Vorys, Sater, Seymour and Pease LLP

52 East Gay Street Columbus, OH 43215

Phone: (614) 464-5481

Fax: (614) 719-4810

Email: anbroz@vorys.com

aelisinski@vorys.com

ssboudouris@vorys.com

pwresier@vorys.com

*Counsel for Third-Party Defendant
P.R.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 5, 2019, a true and accurate copy of the foregoing was filed with the Court's electronic filing system. Notice of this filing will be sent by operation of the Court's ECF system to counsel for all parties indicated on the electronic filing receipt.

/s/ Alycia N. Broz
Alycia N. Broz (0070205)